## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARKING MARYLAND NORTHERN DIVISION 2002 JUN 25 P 2: 09

## UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT TO FILE CROSS MOTION FOR SUMMARY JUDGMENT

Defendant, Warfield-Rohr Casket Company, Inc. ("Warfield-Rohr"), by its attorney, requests a one week extension to respond to the Motion for Summary Judgment filed by Equal Employment Opportunity Commission ("EEOC") and to file a cross motion for summary judgment and states as follows:

- 1. Pursuant to the Court's Scheduling Order, the summary judgment deadline was June 19, 2002.
- 2. As both parties intended to file Motions for Summary Judgment, the parties agreed, in accordance with Local Rule 105.2.c, that Plaintiff would file its motion first.
- 3. As a result, Plaintiff filed its Motion for Summary Judgment on June 19, 2002. The undersigned received a copy of the Motion on June 24, 2002.

STATES DISTRICT JUDIES

- 4. Defendants' Opposition and Cross Motion for Summary Judgment is due on July 5, 2002.
  - 5. The undersigned will be on vacation during the week of July 1, 2002.
- 6. Accordingly, Defendant requests a one week extension to file its Opposition and Cross Motion for Summary Judgment until July 12, 2002.
  - 7. Regina M. Andrew, Esquire, counsel for EEOC does not oppose this request.

WHEREFORE, Defendant requests that the Court extend the time in which Defendant is required to file its Opposition and Cross Motion for Summary Judgment until July 12, 2002.

Respectfully submitted,

Charles S. Hirsch

Ballard Spahr Andrews & Ingersoll, LLP

300 East Lombard Street, 19th Floor

Baltimore, MD 21201

(410) 528-5503

Attorney for Defendant

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of June, 2002 a copy of the foregoing Warfield-Rohr Casket Company, Inc.'s Unopposed Motion for an Extension of Time to Plaintiff's Motion for Summary Judgment and file Cross Motion for Summary Judgment was served via facsimile and first class mail, postage pre-paid to:

> Gerald S. Kiel, Esquire Stephen P. O'Rourke, Esquire Regina M. Andrew, Esquire **Equal Employment Opportunity Commission Baltimore District Office** 10 South Howard Street Third Floor Baltimore, Maryland 21201

LAW OFFICES

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CHARLES S. HIRSCH DIRECT DIAL: 410-528-5503 PERSONAL FAX: 410-361-8926 HIRSCH@BALLARDSPAHR.COM

June 25, 2002

**VIA HAND DELIVERY** 

Civil Clerk United States District Court for the District of Maryland Garmatz Federal Courthouse 101 West Lombard Street Baltimore, Maryland 21201

PILM INTERED MAN CONTO JUN 25 2002 ALESS UNITED TO STATE OF THE DISTRICT IN MARYLAND

Re:

Equal Employment Opportunity Commission v.

Warfield-Rohr Casket Company, Inc.

Civil Action No. WMN-01-2872

Dear Clerk:

Enclosed is the original and two copies of Warfield-Rohr's Unopposed Motion for an Extension of Time to Plaintiff's Motion for Summary Judgment to File Cross Motion for Summary Judgment in the above-referenced action.

Thank you for your cooperation in this matter. Please do not hesitate to contact me if you have any questions.

Very truly yours,

CSH/vh